

**ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT
(AHWMMA)**

Compliance Evaluation Inspection (CEI) Report

Author of Report

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Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

Facility Information

Rehau Auto LLC & Rehau Construction LLC (Rehau)
2424 Industrial Drive SW
Cullman, AL 35055
EPA ID Number: ALR000000612
NAICS Code: 326199
Website: www.Rehau.com

Responsible Officials

Mr. Mike Mullaney, Environmental Health and Safety

Inspection Participants

Mr. Mullaney
Ms. Paula Whiting, USEPA Region 4
Mr. McMillian

Date of Inspection

12/2/2019

Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

Purpose of Inspection

To determine compliance with all applicable requirements of the Hazardous Waste Program regulations.

Facility Description

Rehau Automotive is a manufacturer of injection-molded plastic exterior parts (bumpers, fender trim, etc.) for consumer vehicles. The facility currently employs 550 people and operates on three shifts five days/week.

Rehau Construction is an extrusion-based manufacturing company that produces Cross-linked polyethylene (PEX) tubing and refrigerator gaskets. This division of the company currently employs 124 people and operates on four shifts 24/7.

For a full description of the facility and its activities, please refer to the December 10, 2007, hazardous waste Trip Memo.

In its most recent notification of regulated waste activity (ADEM Form 8700-12, dated February 14, 2019) Rehau notified as a large quantity generator of hazardous waste, a small quantity handler of universal waste, and a used oil generator.

Findings

We arrived at the facility at approximately 11:05 am. Mr. Mullaney greeted us and served as the facility representative during the inspection. During the opening conference, we presented identification and explained the purpose of the inspection. Following the opening conference, Mr. Mullaney provided a tour of the facility, during which time we conducted the inspection.

The following areas were inspected during the walkthrough:

Oil/Water Separator Room

There were three mop buckets on the floor with oily water in them. The contents of the buckets will be poured into the oil/water separator, according to Mr. Mullaney. One 300 gallon tote of used hydraulic fluid was observed on a transfer platform. This platform also served as the secondary containment for the tote and it was completely filled with oily water. One 55-gallon drum for used oil was observed open and not labeled with the words "Used Oil". No other concerns were noted in this area.

Across from the oil/water separator room, we observed four 300-gallon plastic totes staged together. Mr. Mullaney stated that the totes contained a mixture of detergents and hydraulic fluid. These containers will go to the oil/water separator room. We also observed a tote that was cut in half and filled with used oil. Mr. Mullaney stated that he was unsure of who cut the container and who placed used oil in it, but he would address it immediately.

From there, we moved to the wall adjacent to the oil/water separator room. We observed five 300-gallon totes staged along the wall on containment pallets. Four of the containers were labeled "used hydraulic oil/water" and the fifth container was labeled do not use. The containers were closed labeled in good condition. No areas of concern were noted in this area.

Used Oil Storage Tank

The used oil storage tank is adjacent to the oil/water separator room on a concrete pad on the outside of the building. The tank is approximately 10,000 gallons. The tank was not labeled with the words "Used Oil", but was in good condition. We noticed a small puddle of water between the storage tank and the building. There was visible staining in the relief joint of the wall behind the storage tank. It appears that used oil had reached the environment at some point and may still be present according to the sheen on the water in this area. Mr. stated that he would investigate the issue. No other concerns were noted in this area.

Paint Kitchen

This area is located on the south side of the facility. The paint area recently changed its paint from a primarily solvent-based system to a water-based system which has resulted in a decrease in the hazardous waste generation from this area. The waste generation in this area is primarily from flushing the supply lines during color changes.

Although the facility has converted to water-based paint for the base coat of the vehicles, solvent-based paint is still used for the clear coat layer of the vehicles. The satellite accumulation area is located at the end of the paint lines in an accessed-controlled room. There was one 55-gallon drum of hazardous waste designated for line flush fluid. The drum was labeled, but not closed. No other areas of concern were noted in this area.

Hazardous Waste Storage Area

The hazardous waste storage area is also located on the south side of the facility in a fenced area outside. The area has the appropriate signage at every approach and has a means to control access to the area. There were fifty-five 55-gallon drums, one 300-gallon tote, and four 3-gallon buckets of hazardous waste in the area. All of the containers were closed, labeled, dated, and in good condition. The oldest container was dated 9/14/19. The secondary containment appeared to be in good condition and was free of any cracks or gaps. No areas of concern were noted in this area.

PEX line

In this area, plastic pellets are extruded into hollow tubing of varying diameters for various application. There was one 55-gallon drum designated for hazardous waste at the beginning of the line. The drum was labeled, but not closed. This area has approximately twelve production lines with a 5-gallon satellite accumulation container at the end of each line. All of these containers were missing the words "Hazardous Waste". No other areas of concern were noted in this area.

File review

When we completed the walkthrough portion of the inspection, we moved to the office area to conduct a review of required documentation. The following documents were inspected:

- Hazardous waste shipping Manifest
- Weekly hazardous waste inspection log
- Hazardous Waste Employee Training
- Contingency Plan & Quick Reference Guide
- Biennial Report
- Waste Minimization Plan

According to the file review, the facility has not created a quick reference guide for its updated contingency plan. All other required documentation appeared to be accurate and complete.

Summary

At the conclusion of the inspection, we met with Mr. Mullaney to discuss the results of the inspection. During the closing meeting, I prepared and provided a preliminary inspection report to him. Mr. Mullaney acknowledged receipt by signing the form. We departed the facility at approximately 6:00 pm.

Signed



Compliance and Enforcement Section, Industrial Hazardous Waste Branch

Land Division

December 13, 2019

Date

Concurrence

Brent A. Watson, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

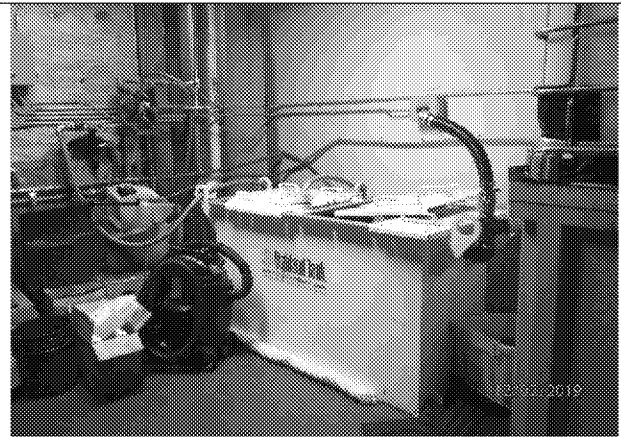
December 16, 2019

Date

Photo Log



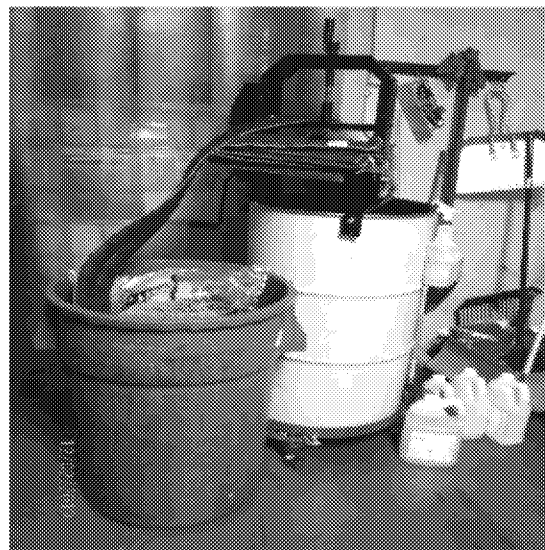
Used Oil in Secondary Containment



Oil/Water Separator and one mop bucket containing oily water



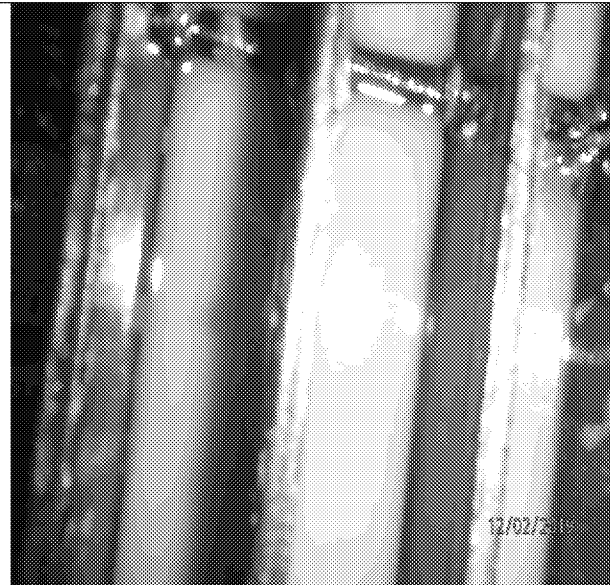
mop bucket containing oily water



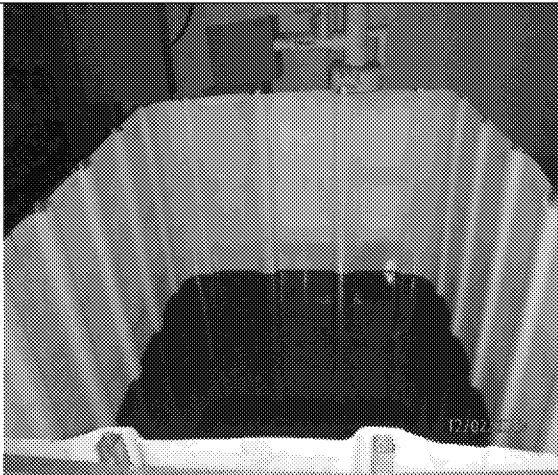
Absorbent pads satellite accumulation



300 gallon Tote Platform



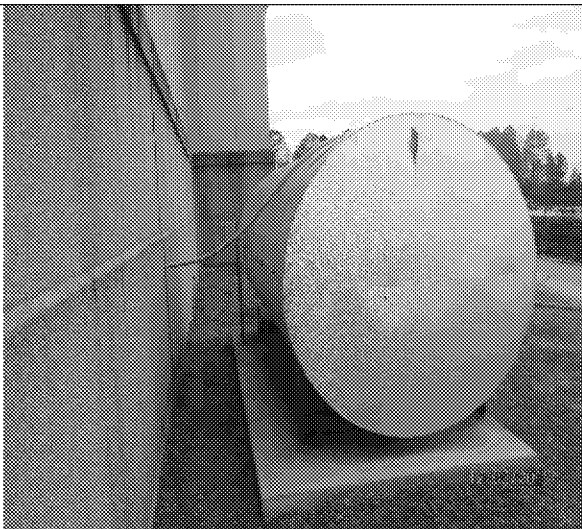
Secondary Containment; Tote Platform



Used oil in a tote that was cut in half



Used oil storage tank



Staining on the soil behind the used oil tank



Staining in the building joint



Hazardous Waste Storage Area



Hazardous Waste Storage Area



Hazardous waste Storage Area



Satellite Accumulation Container; PEX II ne